

**TDS TELECOM**

REC'D TN  
REGULATORY AUTH.

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Government and Regulatory Affairs

100 APR 23 AM 9 42

April 22, 1999

OFFICE OF THE  
EXECUTIVE SECRETARY  
\*\*Via Facsimile & Overnight Mail\*\*

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

**RECEIVED**  
ADMINISTRATIVE

APR 23 1999

TN REGULATORY AUTHORITY

JR

Re: IntraLATA Toll Dialing Parity Plan

Dear Mr. Waddell:

99-00300

In accordance with the Federal Communications Commission (FCC) Orders 96-333 and 99-54 in CC docket No. 96-98, TDS TELECOM submits on behalf of its Subsidiaries in Tennessee (TDS TELECOM/Concord Telephone Exchange, TDS TELECOM/Humphreys County Telephone, TDS TELECOM/Tellico Telephone and TDS TELECOM/Tennessee Telephone (hereafter referred to collectively as "TDS TELECOM") an IntraLATA Toll Dialing Parity Implementation Plan ("Plan") and a motion for approval of said plan. TDS TELECOM respectfully requests that the Plan, which proposes to implement intraLATA dialing parity by July 22, 1999, be approved as of 30 days prior to the proposed implementation date in order to conform with the FCC's directives.

Should you have any questions, please do not hesitate to call me at (423) 671-4754.

Sincerely,

  
John D. Feehan  
Manager - External Relations

Enclosure

Cc: Mr. T.G. Pappas - Bass Berry & Sims, PLC

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

REC'D TN  
REGULATORY AUTH.

'99 APR 23 AM 9 44

**Implementation of  
IntraLATA Toll Dialing Parity  
pursuant to the provisions of  
47 U.S.C. § 251(b)3**

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**DOCKET NO.** 99-00300 OF THE  
EXECUTIVE SECRETARY

**TDS TELECOM  
MOTION FOR APPROVAL OF  
INTRALATA PRESUBSCRIPTION IMPLEMENTATION PLAN**

TDS TELECOM respectfully submits its intraLATA toll presubscription implementation plan on behalf of TDS TELECOM/Concord Telephone Exchange, TDS TELECOM/Humphreys County Telephone, TDS TELECOM/Tellico Telephone and TDS TELECOM/Tennessee Telephone (hereafter referred to collectively as "TDS TELECOM") for approval as outlined in Exhibit A attached.<sup>1</sup> This memorandum outlines TDS TELECOM plans to implement full Two-PIC presubscription in its service areas in Tennessee by July 22, 1999. The attached exhibit provides additional detailed information regarding TDS TELECOM plans to implement presubscription.

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<sup>1</sup> TDS TELECOM implementation plan, attached as Exhibit A to this Motion, is submitted pursuant to the FCC's Second Report and Order, *In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, ¶ 39, CC Docket No. 96-98 (Aug. 8, 1996) [hereinafter FCC Order]. According to the FCC's rules, the implementation plan must include (1) a proposal that explains how the LEC will offer intraLATA toll dialing parity for each exchange that the LEC operates in the state and a proposed schedule for implementation; and (2) a proposal for timely notification of its subscribers and the method it proposes to use to enable subscribers to select an intraLATA carrier. 47 U.S.C. § 51.213(b). TDS TELECOM Plan meets both of these requirements.

## **I. TIMING AND METHOD OF PRESUBSCRIPTION.**

TDS TELECOM is currently updating its systems to implement intraLATA presubscription for its entire service area no later than July 22, 1999. TDS TELECOM will notify carriers sixty days in advance of its planned implementation date.

Consistent with the FCC Order,<sup>2</sup> TDS TELECOM intends to implement intraLATA presubscription using the full Two-PIC methodology. This methodology allows customers to presubscribe to one telecommunications carrier for interLATA toll calls and to presubscribe to another telecommunications carrier for intraLATA toll calls.

All intraLATA toll calls, including operator service (0+ interexchange) and 1-NPA-555-1212, will be subject to intraLATA presubscription. TDS TELECOM will continue to handle the following calls of its local service subscribers: 911, 611, 0, 0+ intraexchange, and 7 or 10 digit intraexchange.

## **II. CUSTOMER SELECTION PROCESS.**

TDS TELECOM proposes no balloting and allocation process for customers to select an intraLATA toll carrier. TDS TELECOM may utilize any form of customer notice and as allowed may rely on Interexchange Carriers marketing efforts to inform customers of intraLATA presubscription. Under the plan, existing customers will be able to change intraLATA carriers one time at no charge within the first ninety days after presubscription is implemented. The carrier selected by the customer will be required to pay the PIC-change charge. Carriers should be able to educate their targeted customer base concerning the availability of presubscription

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<sup>2</sup> FCC Order ¶ 49.

within the ninety-day period through marketing efforts.

In addition, new customers will be able to make a free intraLATA PIC choice at the time they sign up for service. If new customers cannot decide on an intraLATA carrier, they will have thirty days to make an intraLATA PIC choice without a charge. In the meantime, they will be assigned a “no-PIC” and will have to dial an access code to make intraLATA toll calls. This approach is consistent with the FCC Order<sup>3</sup> and the current practice for interLATA carrier selection.

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<sup>3</sup>

FCC Order ¶¶ 41, 81.

**Conclusion**

TDS TELECOM respectfully requests that this plan be approved as of thirty (30) days prior to the July 22, 1999 implementation date (June 22, 1999).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John D. Feehan', is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

John D. Feehan  
Manager External Relations  
TDS TELECOM

REC'D TN  
REGULATORY AUTH.

EXHIBIT A

**TDS TELECOM**  
**PRESUBSCRIPTION IMPLEMENTATION PLAN**

OFFICE OF THE  
EXECUTIVE SECRETARY

**1. INTRODUCTION**

TDS TELECOM consisting of TDS TELECOM/Concord Telephone Exchange, TDS TELECOM/Humphreys County Telephone, TDS TELECOM/Tellico Telephone and TDS TELECOM/Tennessee Telephone (hereafter referred to collectively as "TDS TELECOM"), in accordance with the August 8, 1996 Federal Communications Commission (FCC) Second Report and Order,<sup>4</sup> submits this Implementation Plan for intraLATA presubscription.

Currently, BellSouth Telecommunications, Inc. ("BellSouth") completes all 1+ and 0+ intraLATA toll traffic in TDS TELECOM service territories. An access code is required for this traffic to be routed to a carrier other than BellSouth. IntraLATA presubscription will allow customers to dial 1+ or 0+ an intraLATA number to make an intraLATA toll call and automatically route that call to the customer's presubscribed carrier. IntraLATA presubscription will provide TDS TELECOM customers access to other intraLATA toll competitors with access that is equal in type and quality in the provision of intraLATA toll service.

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<sup>4</sup> Second Report and Order, In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98 (Aug. 8, 1996) [hereinafter FCC Order].

## **2. IMPLEMENTATION**

### **2.1 Objectives**

TDS TELECOM objectives for intraLATA presubscription are to:

- Successfully implement intraLATA presubscription;
- Minimize customer confusion;
- Ensure that customers understand they have choices; and
- Treat all toll competitors on a non-discriminatory basis.

### **2.2 Schedule**

TDS TELECOM will implement presubscription for its service territory no later than July 22, 1999. Implementation will be done simultaneously in all central offices on a flash-cut basis.

## **3. NETWORK PLANS**

### **3.1 Technology**

TDS TELECOM utilizes switches manufactured by Siemens or AT&T (Lucent Technologies). The software controlling these switches has been upgraded to achieve full Two-PIC capability for intraLATA presubscription.

### **3.2 Methodology**

Consistent with the FCC Order, TDS TELECOM plans to implement intraLATA presubscription using the full Two-PIC methodology.

### **3.3 Network Operations**

TDS TELECOM has identified a three-step process that must be completed to implement intraLATA presubscription.

- 1) Feature Negotiation. The feature negotiation step of the process includes negotiating costs with switch vendors, paying the right to use fees, and establishing a date to have the feature activated in each switch. This process has been completed.
- 2) Activate Feature, Software and Translations in the Switch. This step involves the actual activation of the switch generic software for a second PIC option on the customer's line and line and trunk translations in every switch. This process will be completed by the end of implementation.
- 3) Integration Testing. In this stage, information systems and operation support systems are tested to ensure that all processes are designed, coded and tested. This process will be completed by the end of implementation.

### **4. INFORMATION SYSTEMS/OPERATION SUPPORT SYSTEMS**

In order to effectively implement intraLATA presubscription, TDS TELECOM must modify its administrative and operations support systems. First, TDS TELECOM identified all systems that would be affected by intraLATA presubscription. Second, after identifying the specific requirements, new programs are in the process of being written for each system. Third, upon completion of the software work, the new program for each system will be implemented.

Program changes will be tested to ensure that the requirements have been met and that the system functions properly. Fourth, integration testing will be performed to test the compatibility of all the revised systems. Finally, the service consultants will be trained on the use of these modified systems.



## **5. CARRIER NEGOTIATION**

### **5.1 Access Carrier Name Abbreviation**

An Access Carrier Name Abbreviation (ACNA) is a three digit alpha code assigned by Bellcore to inter/intraLATA carriers. All intraLATA toll providers must have a valid ACNA assigned by Bellcore.

### **5.2 Carrier Identification Code (CIC)**

The Carrier Identification Code (CIC) is a unique three or four digit access identification code that is assigned by the North American Numbering Plan (NANP) Administrator for use with Feature Group B or D Switched Access Service. The CIC is used to identify the inter/intraLATA toll provider.

### **5.3 Carrier Verification Number**

Customers can dial the intraLATA verification number to verify which carrier they are presubscribed to for intraLATA toll calls. The Industry Numbering Committee has reserved the number 700-4141 for these purposes, and TDS TELECOM will support the industry-approved number. The local dialing arrangements may require that the Home NPA code be dialed before this seven digit number, i.e., (412) 700-4141. Customers will have a number for intraLATA verification (home 412-700-4141) in addition to the already existing number for interLATA verification (700-555-4141).

TDS TELECOM will complete the appropriate translations work in each end office to establish the 700 number as an intraLATA toll code. Switches will then have the capability to route calls to the 700 number to the customer's presubscribed carrier.

#### **5.4 Toll Carrier Obligation**

All intraLATA toll providers must have a Feature Group D (FGD) or Feature Group D-like trunk and a Letter of Intent on file with TDS TELECOM to be a presubscribed, intraLATA toll provider. Carriers may use existing FGD trunks to carry their inter/intraLATA toll traffic when they use the interLATA CIC for intraLATA toll. Each carrier must determine if additional facilities are needed to handle the intraLATA toll traffic and then submit Access Service Requests to the TDS TELECOM Access Carrier Service Group.

### **6. CUSTOMER AND CALL ELIGIBILITY**

IntraLATA presubscription will be provided on all residence and business lines. Pay Telephones will be presubscribed in accordance with the provisions of the Telecommunications Act of 1996 and any final FCC rules.

#### **6.1 Call Eligibility**

TDS TELECOM plans to offer intraLATA presubscription on all calls that originate within TDS TELECOM service territory that are designated as intraLATA toll calls, including operator service (0+ interexchange) and 1-NPA-555-1212. TDS TELECOM will handle the following calls: 911, 611, 0-,0+ intraexchange, and 7 or 10 digit intraexchange calls.

## 6.2 IntraLATA Toll Dialing Plan

<b>If A TDS TELECOM Customer Dials:</b>	<b>Then Call Is Handled By:</b>
0	TDS TELECOM Contracted Operator
0 + Intraexchange	TDS TELECOM Contracted Operator
1 + 7/10 digit	IntraLATA Toll Provider
0 + 7/10 digit Interexchange	IntraLATA Toll Operator
101XXXX + 0	IntraLATA Toll Provider
101XXXX + 0 + 7/10 digit	IntraLATA Toll Provider
101XXXX + 7/10 digit	IntraLATA Toll Provider

If a carrier does not provide operator services, it is the carrier's responsibility to block such calls and provide customers with an appropriate message.

## 6.3 Casual Calling

A customer will have a choice of using a carrier other than his or her presubscribed intraLATA toll carrier by dialing an access code. This is known in the industry as casual calling. The customer must dial the carrier access code, NPA if necessary, and XXX-XXXX.

## **7. CARRIER SELECTION**

### **7.1 New Customers**

A new TDS TELECOM customer (including an existing customer who orders an additional line) will be permitted to make a free intraLATA PIC choice at the time of ordering service. If a customer cannot decide upon an intraLATA carrier at that time, the customer will have thirty days following completion of the service request to make an intraLATA PIC choice without charge. In the meantime, the customer will be assigned a "no-PIC" and will have to dial an access code to make intraLATA toll calls.

### **7.2 Existing Customers**

TDS TELECOM recommends that existing TDS TELECOM customers not be charged for one PIC-change made during the first ninety days after presubscription is implemented. The carrier selected by the customer will be required to pay this initial PIC-change charge. TDS TELECOM proposes that there be no balloting and allocation process. All current customers will remain presubscribed to BellSouth until they initiate a change in intraLATA toll provider.

## **8. NOTIFICATION**

### **8.1 Customer Notification**

In a competitive marketplace, each competitive carrier is responsible for marketing and selling its toll services. . TDS TELECOM may utilize any form of customer notice, thus, all customer education may be handled by the intraLATA toll providers through marketing efforts.

## **8.2 Implementation Notification**

An implementation schedule will be provided to all toll providers approximately sixty days prior to the implementation date. The following information will be contained on the schedule:

- End Office Name
- End Office Location Common Language Location Identification (CLLI)
- Equipment Type
- NPA/NXX(s)
- LATA
- Implementation Date

## **9. PIC SUBMISSION**

IntraLATA toll carriers have the option of submitting business and residence PIC-change requests mechanically via the Equal Access Mechanized Interface (EAMI) or manually via the Equal Access Point of Contact. Orders must be submitted in the industry-approved Customer Account Record Exchange (CARE) format. Specific details on EAMI/CARE requirements are stated in Version 12 of the existing industry approved CARE and EAMI System Guidelines.

## **9.1 Exchange of Information**

TDS TELECOM will use the industry-approved CARE process to exchange information with participating intraLATA toll providers. This will be the same information currently provided to interLATA carriers and will be available monthly. The Report will be expanded from its current form to include intraLATA PIC related information. The data includes a list of all customers who signed up with or disconnected from the carrier. The exchange is available on paper or tape, or by electronic transmission. TDS TELECOM will provide other intraLATA toll providers the same information in the same time frame it provides that information to its own marketing and sales representatives.

## **10. ANTI-SLAMMING AND LETTER OF AUTHORIZATION REQUIREMENTS**

### **10.1 General**

TDS TELECOM will adhere to the rules adopted by the TRA to resolve customer complaints of intraLATA toll slamming.

### **10.2 Don't Touch (DT)**

The PIC “freeze” or “Don't Touch” option, which requires prior approval from a customer before that customer's PIC is changed, is currently available in the interLATA arena as a means of customer protection in response to the problem of slamming. TDS TELECOM will provide a “Don't Touch” option to customers for their intraLATA toll service, but will not automatically extend a “Don't Touch” on an interLATA account to an intraLATA account. TDS TELECOM will not market or actively offer such an intraLATA PIC freeze for a period of 90 days following equal access conversion.

### **10.3 TDS TELECOM Neutrality**

TDS TELECOM will handle customer/carrier PIC assignment disputes in a neutral manner, to ensure that the customer is provided with the carrier requested.

## **11. PROCESSING ORDERS**

TDS TELECOM will begin processing orders for intraLATA presubscription at 12:01 A.M. on the implementation date. Every effort will be made to process this initial group of orders in a timely manner. However, due to the volume expected immediately following implementation, an order-processing interval has been established. The processing interval will be five business days from the receipt of the order/file during the first four weeks following implementation. After the initial implementation period, orders will be processed following normal date due intervals.

During the period prior to implementation of presubscription, a customer may change his PIC several times. The Ordering and Billing Forum has reached "final closure" on using the date field on the mechanized record used to transmit PIC-change information as the "PIC authorization date." TDS TELECOM will use this date field to implement a customer's last selection. This is known as "Last PIC Sticks." TDS TELECOM will be reliant on carriers to use the date field correctly.

## **12. BUSINESS OFFICE PRACTICES**

TDS TELECOM will implement reasonable and necessary training measures to assure that TDS TELECOM employees who interact with customers do so in a fair and impartial manner when such customers contact TDS TELECOM to presubscribe to the customer's intraLATA toll carrier of choice.



**13. COST RECOVERY**

TDS TELECOM will file for approval with the TRA, an Equal Access Impact Recovery Plan that will be developed and implemented in coordination with IntraLATA Presubscription.

**14. RIGHTS UNDER §251(F)(2) OF THE TELECOMMUNICATIONS ACT OF 1996**

The filing of this plan does not preclude TDS TELECOM from exercising any of its rights to Suspension or Modification under §251(f)(2) of The Telecommunications Act of 1996.